REMARKS

The enclosed is responsive to the Examiner's Final Office Action mailed on May 28, 2008 and is being filed pursuant to a Request for Continued Examination (RCE) as provided under 37 CFR 1.114. At the time the Examiner mailed the Final Office Action claims 1-6, 8-14, 16-20, 22, 23 and 25-32 were pending. By way of the present response the Applicants have: 1) amended no claims; 2) added no new claims; and 3) canceled no claims. As such, claims 1-6, 8-14, 16-20, 22, 23 and 25-32 are now pending. The Applicants respectfully request reconsideration of the present application and the allowance of all claims now represented.

Claim Rejections

35 U.S.C. 103(a) Rejections

The Examiner rejected claims 1-23 and 25-32 under 35 U.S.C. 103(a) as being unpatentable over Ahmavaara, et al., U.S. Publication No. 2005/0272465 (hereinafter "Ahmavaara") and further in view of Melpignano, U.S. Publication No. 2005/0176473 (hereinafter "Melpignano").

Ahmavaara describes a method for providing access from a WLAN network to a GPRS service. *See e.g.*, Ahmavaara, paragraphs [0016]-[0017] and [0024]-[0030].

Melpignano describes a mobile device that can connect to the internet using WPAN, WLAN, GPRS, or 3G.

The combination of Ahmavaara and Melpignano does not describe what Applicants' claims require. With respect to claims 1 and 9, the combination does not describe:

> using credential information stored in a subscriber
> identity module (SIM) associated with a General
> Packet Radio Service (GPRS) adapter to
> authenticate access to a new wireless local area
> network (WLAN), wherein an access to a GPRS

network via the GPRS adapter is authenticated
using the credential information, and
communications with the SIM and the WLAN are
carried out using extensible authentication
protocol for subscriber identity module (EAP-SIM).

Ahmavaara describes an user equipment (UE) device that is connected to a WLAN gaining access to GPRS services (or other packet-switched services) via GPRS network. *See e.g.*, Ahmavaara, paragraphs [0016]-[0017], [0024]-[0030], and [0034] and Figures 1-3. Accordingly, Ahmavaara does not describe <u>using credential information stored in a subscriber identity module (SIM) associated with a General Packet Radio Service (GPRS) adapter to authenticate access to a **new** wireless local area network (WLAN)</u>. In Ahmavaara, a WLAN connection is already established and connection to GPRS services via the WLAN is made (the opposite of what is claimed).

In its explanation that Ahmavaara is still relevant despite the fact that it describes a scenario that is the opposite of what is claimed, the Office Action states that Ahmavaara "is not restricted to WLAN and GPRS but can be used in any network architecture where the authentication signaling message being used as Extensible Authentication Protocol (EAP) to access to networks..." Office Action, page 2. This statement is substantial similar to a passage in Ahmavaara which reads "the present invention is not restricted to the described WLAN and GPRS service and can be used in any network architecture where a control plane signaling required for accessing a packet-switched service is not provided in the access network" (Ahmavaara, paragraph [0034]), but leaves out the portion in Ahmavaara that notes that access to services and not network access are described. In Ahmavaara, these packet-switched services are GPRS services. Applicants are claiming access to a WLAN not GPRS services. Moreover, in Ahmavaara, there already is access to both the WLAN and GPRS network 70, but not to specific applications that are only accessible via GPRS. Therefore, the proposed reading of Ahmavaara is overly broad and not supported. Melpignano adds nothing to this aspect.

Thus, the combination of Ahmavaara and Melpignano does not describe what Applicants' claims 1 and 9 require. Claims 2-6 and 8 are dependent on claim 1 and are allowable for at least the same rationale. Claims 10-14 and 16 are dependent on claim 9 and are allowable for at least the same rationale.

With respect to claim 17, the Ahmavaara does not describe:[1]

> A system, comprising:
> a wireless local area network (WLAN) adapter;
> a general packet radio service (GPRS) adapter coupled to the WLAN adapter and including a subscriber identity module (SIM); and
> <u>a mobility client to initiate requests for credential information from the SIM to authenticate access to a new WLAN when the mobility recognizes an access point,</u> wherein an access to a GPRS network via the GPRS adapter is authenticated using the credential information, and said requests for the credential information are communicated to the SIM using extensible authentication protocol for subscriber identity module (EAP-SIM).

As discussed above, Ahmavaara describes an user equipment (UE) device that is connected to a WLAN gaining access to GPRS services (or other packet-switched services) via a GPRS network. *See e.g.*, Ahmavaara, paragraphs [0016]-[0017], [0024]-[0030], and [0034] and Figures 1-3. Accordingly, Ahmavaara does not describe "a mobility client to initiate requests for credential information from the SIM to authenticate access to a new WLAN when the mobility recognizes an access point." In Ahmavaara, a WLAN connection is already established and connection to GPRS services via the WLAN is made (the opposite of what is claimed).

In its explanation that Ahmavaara is still relevant despite the fact that it describes a scenario that is the opposite of what is claimed, the Office Action states that Ahmavaara "is not restricted to WLAN and GPRS but can be used in

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[1] Melpignano is not cited in the rejection for claim 17.

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any network architecture where the authentication signaling message being used as Extensible Authentication Protocol (EAP) to access to networks…" Office Action, page 2. This statement is substantial similar to a passage in Ahmavaara which reads "the present invention is not restricted to the described WLAN and GPRS service and can be used in any network architecture where a control plane signaling required for accessing a packet-switched service is not provided in the access network" (Ahmavaara, paragraph [0034]), but leaves out the portion in Ahmavaara that notes that access to services and not network access are described. In Ahmavaara, these packet-switched services are GPRS services. Applicants are claiming access to a WLAN not GPRS services. Moreover, in Ahmavaara, there already is access to both the WLAN and GPRS network 70, but not to specific applications that are only accessible via GPRS. Therefore, the proposed reading of Ahmavaara is overly broad and not supported.

Thus, Ahmavaara does not describe what Applicants' claim 17 requires. Claims 18-20, 22-23, and 25-26 are dependent on claim 17 and are allowable for at least the same rationale.

With respect to claim 27, the Ahmavaara does not describe:[2]

> A system, comprising:
> means for initiating requests for credential information from a subscriber identity module (SIM) associated with a general packet radio service (GPRS) adapter, wherein a GPRS connection via the GPRS adapter is authenticated using the credential information;
> means for utilizing the credential information to authenticate access to a new wireless local area network (WLAN) using extensible authentication protocol for subscriber identity module (EAP-SIM); and
> means for switching data services from the GPRS connection to a WLAN connection after the access to the WLAN is authenticated.

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[2] Melpignano is not cited in the rejection for claim 17.

As discussed above, Ahmavaara describes an user equipment (UE) device that is connected to a WLAN gaining access to GPRS services (or other packet-switched services) via a GPRS network. *See e.g.*, Ahmavaara, paragraphs [0016]-[0017], [0024]-[0030], and [0034] and Figures 1-3. Accordingly, Ahmavaara does not describe "means for utilizing the credential information to authenticate access to a new wireless local area network (WLAN) using extensible authentication protocol for subscriber identity module (EAP-SIM)." In Ahmavaara, a WLAN connection is already established and connection to GPRS services via the WLAN is made (the opposite of what is claimed).

In its explanation that Ahmavaara is still relevant despite the fact that it describes a scenario that is the opposite of what is claimed, the Office Action states that Ahmavaara "is not restricted to WLAN and GPRS but can be used in any network architecture where the authentication signaling message being used as Extensible Authentication Protocol (EAP) to access to networks..." Office Action, page 2. This statement is substantial similar to a passage in Ahmavaara which reads "the present invention is not restricted to the described WLAN and GPRS service and can be used in any network architecture where a control plane signaling required for accessing a packet-switched service is not provided in the access network" (Ahmavaara, paragraph [0034]), but leaves out the portion in Ahmavaara that notes that access to services and not network access are described. In Ahmavaara, these packet-switched services are GPRS services. Applicants are claiming access to a WLAN not GPRS services. Moreover, in Ahmavaara, there already is access to both the WLAN and GPRS network 70, but not to specific applications that are only accessible via GPRS. Therefore, the proposed reading of Ahmavaara is overly broad and not supported.

Additionally, Ahmavaara does not describe switching data services. In Ahmavaara a UE has both a WLAN and GPRS connection. *See e.g.*, Ahmavaara, Figures 1-2. At no point is the GPRS connection closed because if it did there would be no way for the UE to access the GPRS service via a LAN. *Id.* Thus, Ahmavaara also does not describe "means for switching data services from the

GPRS connection to a WLAN connection after the access to the WLAN is authenticated."

Thus, Ahmavaara does not describe what Applicants' claim 27 requires. Claims 28-30 are dependent on claim 27 and are allowable for at least the same rationale.

With respect to claims 31 and 32, the Ahmavaara does not describe:[3]

> issuing one or more requests to a Subscriber Identity Module (SIM) associated with a General Packet Radio Service (GPRS) adapter using Extensible Authentication Protocol (EAP), wherein a GPRS connection via the GPRS adapter is authenticated using credential information stored in the SIM;
> arbitrating the one or more requests to the SIM when the SIM is busy;
> receiving the credential information stored in the SIM via a SIM reader driver;
> <u>utilizing the credential information to authenticate access to a new Wireless Local Area Network (WLAN) using extensible authentication protocol for subscriber identity module (EAP-SIM)</u>;
> establishing a WLAN connection with the WLAN via a WLAN adapter;
> <u>issuing a location update to switch data services from the GRPS connection to the WLAN connection</u>; and
> <u>disconnecting from the GPRS connection</u>.

As discussed above, Ahmavaara describes an user equipment (UE) device that is connected to a WLAN gaining access to GPRS services (or other packet-switched services) via a GPRS network. *See e.g.*, Ahmavaara, paragraphs [0016]-[0017], [0024]-[0030], and [0034] and Figures 1-3.   Accordingly, Ahmavaara does not describe "utilizing the credential information to authenticate access to a new Wireless Local Area Network (WLAN) using extensible authentication protocol for subscriber identity module (EAP-SIM)." In Ahmavaara, a WLAN

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[3] Melpignano is not cited in the rejection for claim 17.

connection is already established and connection to GPRS services via the WLAN is made (the opposite of what is claimed).

In its explanation that Ahmavaara is still relevant despite the fact that it describes a scenario that is the opposite of what is claimed, the Office Action states that Ahmavaara "is not restricted to WLAN and GPRS but can be used in any network architecture where the authentication signaling message being used as Extensible Authentication Protocol (EAP) to access to networks..." Office Action, page 2. This statement is substantial similar to a passage in Ahmavaara which reads "the present invention is not restricted to the described WLAN and GPRS service and can be used in any network architecture where a control plane signaling required for accessing a packet-switched service is not provided in the access network" (Ahmavaara, paragraph [0034]), but leaves out the portion in Ahmavaara that notes that access to services and not network access are described. In Ahmavaara, these packet-switched services are GPRS services. Applicants are claiming access to a WLAN not GPRS services. Moreover, in Ahmavaara, there already is access to both the WLAN and GPRS network 70, but not to specific applications that are only accessible via GPRS. Therefore, the proposed reading of Ahmavaara is overly broad and not supported.

Additionally, Ahmavaara does not describe "issuing a location update to switch data services from the GRPS connection to the WLAN connection" or "disconnecting from the GPRS connection." In Ahmavaara a UE has both a WLAN and GPRS connection. *See e.g.*, Ahmavaara, Figures 1-2. At no point is the GPRS connection closed because if it did there would be no way for the UE to access the GPRS service via a LAN. *Id.* Thus, Ahmavaara also does not describe "means for switching data services from the GPRS connection to a WLAN connection after the access to the WLAN is authenticated."

Thus, Ahmavaara does not describe what Applicants' claims 31 and 32 require.

In light of the comments above, the Applicants respectfully request the allowance of all claims.

CONCLUSION

Applicants respectfully submit that all rejections have been overcome and that all pending claims are in condition for allowance.

If there are any additional charges, please charge them to our Deposit Account Number 02-2666. If a telephone conference would facilitate the prosecution of this application, the Examiner is invited to contact Dave Nicholson at (408) 720-8300.

Respectfully submitted,

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